

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

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Implementation of Section 273(d)(5) of)
the Communications Act of 1934, as)
amended by the Telecommunications)
Act of 1996 -- Dispute Resolution)
Regarding Equipment Standards)

GC Docket No. 96-42

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REPLY COMMENTS OF AMERITECH

On April 1, 1996, several parties commented in response to the Notice of Proposed Rulemaking in this proceeding. In these Reply Comments, Ameritech supports the commenting parties' unanimous recommendation that the Commission forgo binding arbitration as the default method for dispute resolution regarding equipment standards. Instead, Ameritech urges the Commission to adopt the flexible dispute resolution process proposed in the Comments of Bell Communications Research, Inc. ("Bellcore").

Ameritech provides broad support to accredited standards development organizations such as the American National Standards Institute's ("ANSI") T1 Committee on Telecommunications. Ameritech also has a critical interest in the work of various non-accredited standards development organizations ("NASDOs"), including the generic requirements work funded through Bellcore and various other forums, such as the ATM Forum, the Internet Engineering Task Force, and the North American ISDN Users' Forum. The work of non-accredited organizations may create needed standards not being addressed by accredited standards

Noted & filed rec'd 07/1

organizations, but they often build from available standards to fill an important need for detailed implementation agreements and conformance level tests. To achieve the goal of ensuring timely multi-supplier interoperability between networks and between customer-owned equipment and networks, prompt resolution of technical disputes is required to avoid delays in implementation of new telecommunications capabilities.

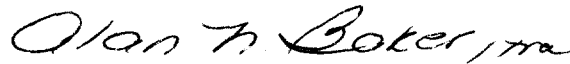
Bellcore's flexible dispute resolution proposal provides for dispute resolution operations as described in its Appendix, in the second paragraph under the heading Selection Options. Bellcore's first two options include internal resolution techniques. Ameritech suggests that an additional internal dispute resolution option be added to the Bellcore proposal whereby the NASDO parties adopt the time tested ANSI-style due process procedures for conflict resolution.

Bellcore's third option is referral of the technical dispute for mediation/recommendation. In Bellcore's Appendix, in the third paragraph under the heading Selection Options, the options for bodies/panels to which disputes may be referred includes another standards body. Ameritech disagrees with the Corning proposal to refer dispute resolution to another standards organization, and observes that even under Bellcore's optional proposals, referral to another standards organization might possibly result in failure of key objectives of the law, including, a thirty-day decision and involvement of the funding parties. Reference of a technical issue to an ANSI accredited standards organization may very well be an appropriate action by the NASDO parties prior to the time that the technical issue requires a formal dispute resolution. At this earlier time, the technical issue could

be referred to another standards organization through the use of a contribution into the organization's normal working procedures.

In conclusion, Ameritech supports Bellcore's flexible dispute resolution proposal, subject to the foregoing observations, and specifically recommends that Bellcore's Tri-Partite Mediation/Recommendation Panel procedures be adopted as the Commission's default dispute resolution alternative. This alternative best meets the criteria of involving funding parties in reaching a decision within the required thirty-day period.

Respectfully submitted,



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April 11, 1996

CERTIFICATE OF SERVICE

I, Audrey L. Hankel, do hereby certify that a copy of the foregoing Reply Comments of Ameritech has been served on all parties entitled thereto, by first-class mail, postage prepaid, on this 11th day of April 1996.

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